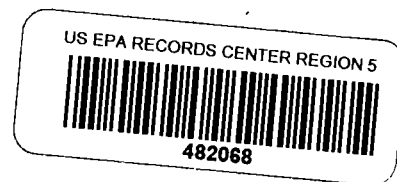


DEPARTMENTAL PROCEDURAL MANUAL FOR
HANDLING HAZARDOUS WASTES



In the attached pages is reflected the procedures necessary for the proper handling of hazardous materials in accordance with the R.C.R.A. Hazardous Waste regulations. It must be constantly kept in mind that these regulations require strict control of all hazardous materials incorporating a "cradle to grave" concept for these materials. These procedures become effective November 19, 1980.

We have identified many of the materials in the plant that fall under these regulations. (See attachment #1). As time progresses, more materials will come under the regulations and as they do, we will advise you.

In order to comply with these regulations, it is imperative that we initiate the policies and procedures for the proper control of these wastes as follows:

1. All oils must be put in covered drums*, segregated as to type (process oil or lubricating oil) and appropriately marked as to contents. This marking must be permanent and legible. Wood, trash, plastic, rubber tailings, or other materials, must not be put into the barrels with oil. They must be discarded in the regular trash containers except for oil-laden tailings which must be kept in a separate barrel.
2. All solvents must be placed into drums*, segregated as to type, and appropriately marked. If any solvents are mixed in the same barrel, it is necessary to indicate this and estimated amounts of each solvent. No solvents are to be mixed together which will react with each other. Solid waste such as wood, trash, etc. are not to be put into solvent barrels.
3. Non-reactive laboratory waste can be put into the same drum as long as the labeling provisions are in compliance.

*Note: Liquids must be put in drums with bungs. Solids must be put into open top drums with covers.

4. Reactive laboratory wastes must be kept in individual barrels or containers to avoid reaction problems. Acids must be neutralized prior to disposal.
5. The floor sweepings, or waste material from around the Banbury compounding station in Rubber and Plastic Compounding Station in Plastic must be put into a barrel and, when full, covered tightly and labeled as to contents and area.
6. All empty bags or containers of rat or mouse poisons or weed killers that fall under Section 261.33e (Attachment #2) must also be put in barrels.
7. Any contaminated water, such as oily water, must be disposed of as per R. Jacobson's instructions:
 - a. If there is oil on the water, the oil must be skimmed off and the water poured through an oil absorbing medium before dumping down the drain.
 - b. If there is lead or other chemical substances as a contaminant in the water, it must be handled like the chemical substance.
 - c. In other instances, call R. Jacobson.
8. All drums of material must be legibly labeled as to our name and EPA number, contents, accumulation date, and the information as indicated in Attachment I. The drums must then be stored in an approved location and segregated from other wastes. Call Facilities & Grounds or Maintenance to transport the drums.
9. Within 90 days, the material must be shipped off the premises. The hauler must be an EPA approved transporter and we must obtain his number.

10. On each shipment of hazardous material, a properly completed shipping manifest must be executed. This must include all of the following information:

1. A manifest document number.
2. The generator's name, mailing address, telephone number and EPA identification number
Bucyrus - OHDO 6410 6628
Stillwater - OKDO 4344 0999
Lexington - TND0 8693 5733
Elkton - TND0 8584 2482
3. The name and EPA identification number of each transporter.
4. The name, address and EPA identification number of the designated facility and an alternate facility, if any.
5. The description of the waste(s) (e.g., proper shipping name and number, etc.).
6. The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle.

The following certification must appear on the manifest:

"This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."

11. The vehicle used for transporting the material must be placarded with the appropriate placard. We must supply these to the transporter in accordance with 49 CFR Part 172, Subpart F.
12. Annually, we must submit a report to the EPA Regional Office on

the amount of hazardous material we shipped during the past year.
This must be submitted by March 1.

13. If you do not receive a copy of the Manifest from the disposal site within 45 days, you must notify EPA of that fact.
14. All records and copies of Manifests must be kept for a period of 3 years.

ATTACHMENT #1

<u>Code No.</u>	<u>Hazardous Waste No.</u>	<u>Description</u>	<u>Proper Shipping Name</u>	<u>UN or NA No.</u>	<u>Label Required</u>
	U107	Processing Oils	Oils - N.O.S.	None	ORM-E Liquid NOS (WM-10)
	F003 U002	Acetone	Acetone	UN 1090	Hazardous Waste (WM-6) Flammable Liquid
64922	F003 U220	Toluene	Toluene	UN 1294	Hazardous Waste - Flammable Liquid
64925	F005 U159	Methyl Ethyl Ketone	Methyl Ethyl Ketone	UN 1193	Hazardous Waste - Flammable Liquid
64920	D001	Isopropyl Alcohol	Isopropanol	UN 1219	Hazardous Waste - Flammable Liquid
	D001	Heptane	Heptane	UN 1206	Hazardous Waste - Flammable Liquid
	D001	Hexane	Hexane	UN 1208	Hazardous Waste - Flammable Liquid
64929	F002 U226	1,1,1, Trichloroethane	1,1,1, Trichloroethane	UN 2831	Hazardous Waste - (WM-6)
60140	D001	Special Fuel	Motor Fuel N.O.S.	NA 1203	Hazardous Waste - Flammable Label
	D001	ASTM Fuel A	Isooctane	UN 1262	Hazardous Waste - Flammable Label
	D001	Kerosene	Kerosene	UN 1223	Hazardous Waste - Flammable Label
	K069	Lead Dust-To be reclaimed	Lead	NA 1794	ORM-E Solid Waste (WM-12)
	U165	Naptha Thinner	Naptha	UN 2553	Hazardous Waste (WM-6) Flammable Label
	D001	Paint Thinner	Compound, lacquer, Paint or varnish removing, reducing or thinning liquid	NA 1142	Hazardous Waste - Flammable Label

<u>Code No.</u>	<u>Hazardous Waste No.</u>	<u>Description</u>	<u>Proper Shipping Name</u>	<u>UN or NA No.</u>	<u>Label Required</u>
	D001	Enamel Paint	Paint, Enamel	UN 1263	Hazardous Waste - Flammable Label
64980	U201	Resorcinol	Resorcinol	UN 2876	ORM-E Liquid Waste (WM-10)
64901	F003 U057	Cyclohexanone	Cyclohexanone	UN 1915	ORM-E Liquid Waste (WM-10)
64902	F003	Peptrex	Cyclohexanone	UN 1915	ORM-E Liquid Waste (WM-10)
	U013	Asbestos	Asbestos	None	ORM-C
63441	U244	TMTM (Thiram)	Thiram	NA 2771	ORM-A Solid Waste
63442	U244	TMTD (Thiram)	Thiram	NA 2771	ORM-A Solid Waste N.O.S.
63851	U107	Plasticizer	Thiram	None	ORM-E Liquid Waste N.O.S. (WM-10)
63703	U107	D.O.P.	Diethyl Phthalate	None	ORM-E Liquid Waste N.O.S. (WM-10)
63451	U219	NA 22	Thiourea	None	ORM-E Solid Waste N.O.S. (WM-12)
63452	U219	DATU #1	Thiourea	None	ORM-E Solid Waste N.O.S. (WM-12)
63453	U219	END-75	Thiourea	None	ORM-E Solid Waste N.O.S. (WM-12)
63461	U-244	MOTS #1 (Thiram)	Thiram	NA 2771	ORM-A Solid Waste N.O.S.
63659		Stabilizer	Barium Cadmium Stabilizer	None	ORM-E Liquid Waste N.O.S. (WM-10)
63662		Stabilizer	Barium Cadmium Stabilizer	None	ORM-E Solid Waste N.O.S. (WM-12)
63651	D008	Cystab	Lead	None	ORM-E Solid Waste N.O.S.
64755	D008	Lead	Lead	None	ORM-E Solid Waste N.O.S.

<u>Code No.</u>	<u>Hazardous Waste No.</u>	<u>Description</u>	<u>Proper Shipping Name</u>	<u>UN or NA No.</u>	<u>Label Required</u>
63507	D008	Lead	Lead	None	ORM-E Solid Waste N.O.S.
63509	D008	Dibasic Lead Phosphite	Dibasic Lead Phosphite	None	ORM-E Solid Waste N.O.S.
63511	D008	Litharge	Lead	None	ORM-E Solid Waste N.O.S.
63516	D008	K-202	Lead	None	ORM-E Solid Waste N.O.S.
64439	D008	Chrome Yellow		None	ORM-E Solid Waste N.O.S.
64760	D001	Sodium Hydroxide	Sodium Hydroxide, dry	UN 1823	Hazardous Waste (WM-6) Corrosive Label
64761	D002	Sodium Nitrate	Sodium Nitrate	UN 1498	Hazardous Waste (WM-6) Oxidizer Label
64762	D001	LCM Salt	Sodium Nitrite	UN 1500	Hazardous Waste (WM-6) Oxidizer Label
64909	D001	Adhesion Inducer	Solvent N.O.S.	NA 1993	Hazardous Waste - Flammable Label
64919	D001	Matthews 10	Solvent N.O.S.	NA 1993	Hazardous Waste - (WM-6) Flammable Label
64921	D001	S-20	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label
64923	D001	Rubber Solvent	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label
64924	D001	151 - TI	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label
64926	D001	Acromark	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label
64927	D001	140-T-10	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label

<u>Code No.</u>	<u>Hazardous Waste No.</u>	<u>Description</u>	<u>Proper Shipping Name</u>	<u>UN or NA No.</u>	<u>Label Required</u>
64928	D001	2NA-7NA-14NA	Solvent N.O.S.	NA 1993	Hazardous Waste (WM-6) Flammable Label
63403	D003	Di Cup 40 C	Dicumyl Peroxide-dry	UN 2121	Hazardous Waste (WM-6) Peroxide Label
63404	D003	VUL Cup 40 KE	Diisopropylbenzene Hydroperoxide	UN 2171	Hazardous Waste (WM-6) Peroxide Label
63406	D003	Percadox	Dicumyl Peroxide-dry	UN 2121	Hazardous Label (WM-6) Peroxide Label
	D001	Laboratory Waste Solvents	Solvent N.O.S.	NA 1933	Hazardous Waste (WM-6) Flammable Label